

UNITED STATES DISTRICT COURT

DISTRICT OF NEW HAMPSHIRE

Michael Sean Speight

V.

Civil No. **1:24-cv-00055**
Chief Judge Landya B. McCafferty

Amanda Kaelblein
Michael Kaelblein
Nancy Kaelblein
George Phelan(Professional, individual capacity)
Eric Stephanie(Professional, individual capacity)

**MOTION TO AMEND DEFAULT JUDGMENT MOTION AGAINST
AMANDA KAEUBLEIN TO ONLY MONETARY DAMAGES.**

The plaintiff is amending his motion for default Judgment against Amanda Kaelblein to monetary damages only.

The plaintiff will itemize the all damages;

1. Plaintiff seeks to be reimbursed for \$6,000. That plaintiff paid Attorney Michael Ryan (See Exhibit 1) The defendant waisted not only court

2. resources but the plaintiffs retainer with this attorney by prolonging Court proceedings.
3. Plaintiff Missed work on June 11, 2022, July 17,2022, September 26, 2022, November 3, 2022, November 15, 2022, November 18, 2022, January 12, 2023, March 14, 2024, May 3, 2024. The plaintiff makes \$104.45 per hour as a Boston union bricklayer; it comes to \$7,520.40 all days that were missed are on record.
4. For pain and suffering, emotionally and mentally infliction caused by the defendant's sadness, anxiety symptoms, rumination, grief, social isolation, hopelessness , and fear the plaintiff requests \$86,480.60 .
There is no amount of compensation that can replace the time the plaintiff lost with V.S.(See Exhibit 2 Therapist evaluation)
5. There is no amount of compensation that can be awarded for the suffering of the plaintiff, and minor child V.S. experienced.

The plaintiff requests a hearing on this motion to be awarded damages, since the defendant does not believe she has to answer this complaint, its well over 100 days since she was served in hand on March 14,2024 in Woburn Family Court.

Date 6/22/24

Respectfully Submitted,

m s.

Michael Sean Speight
100 Main St #106
Pembroke, NH 03275

Michael Sean Speight
100 Main Street
Pembroke, NH 03275

Respectfully submitted,
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100 Main Street
Pembroke, NH 03275

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AFFIDAVIT IN SUPPORT OF MOTION TO AMEND DEFAULT

JUDGMENT AGAINST AMANDA KAEUBLEIN

I swear under the pains of the penalty of perjury, that everything is true and correct to the best of my knowledge.

A copy of this motion was sent to Amanda Kaelblein s New Hampshire Attorney Kristen Weber through email.

Date 6/21/24

m/s

Michael Sean Speight

100 Main Street #106
Pembroke, NH 03275
Speight6317@gmail.com

State of N.H.

County of MERRIMACK

I Certify the following person personally appeared before me this day,
acknowledgement that this person signed this document.

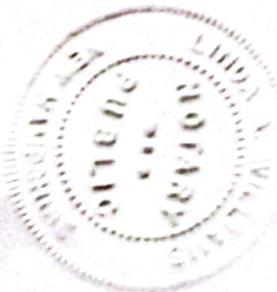
Michael S. Speight

Expires date _____

STATE OF NEW HAMPSHIRE
COUNTY OF MERRIMACK

Subscribed and sworn to before me this

21 day of June 2024
Linda A. Williams



To Whom It May Concern,

This letter is to acknowledge Sean Speight's counseling treatment and how parental alienation has become a significant concern during sessions.

Sean has been struggling with the fear of his bond with his daughter being disrupted as time continues to create distance between them. Sean is also concerned about his daughter establishing negative emotions about him due to his absence.

He feels during this process that his relationship with his daughter may deteriorate and when the time comes for them to reunify his daughter may reject him.

Since there has been no phone contact or visitations Sean has been experiencing sadness, anxiety symptoms, rumination, grief, social isolation and hopelessness which is evident during counseling. If there are additional resources that can provide him the support he needs due to this parental alienation, that would be greatly appreciated.

Sincerely,

Toni Wedge

Toni Wedge LSW, LADC, CFRC

Linden Recovery Therapy Services LLC

lindenrecoveryllc@gmail.com

978-494-4508

LAW OFFICES OF MICHAEL T. RYAN
145 SOUTH MAIN STREET
BRADFORD, MA 01835
Tel (978) 914-6157 Fax (978) 478-6198
mtrrrh@aol.com

Admitted in Massachusetts and New Hampshire

October 19, 2022

Mr. Michael Sean Speight
100 Main Street
Pembroke, NH 03275

Re:

In the Matter of Noelle Kaelblein v. Michael Sean Speight
10th Circuit-District Division-Derry
Case Number: 431-2022-CV-00066

Amanda Kaelblein v. Michael Sean Speight,
Malden District Court
Docket Number: 2250RO0375

In the Matter of Michael Speight and Amanda Kaelblein
10th Circuit-Family Division-Derry
Case Number: 622-2022-DM-00139

INVOICE FOR PROFESSIONAL SERVICES

6/6/2022	Initial client meeting	No charge
6/14/2022	Prepare Notice of Appearance and prepare for 209A Hearing Malden District Court, Telephone call (TC) with client	1.1 hours
6/15/2022	Attend 209A hearing Malden District Court	4.0 hours
6/28/2022	Prepare Notice of Appearance and prepare for Stalking Hearing Derry District Court	1.0 hours
6/29/2022	Prepare for and attend Stalking Hearing Derry District Court	2.5 hours
7/2/2022	Review Derry District Court Order dated 6/29/2022, Prepare Motion for Reconsideration of 6/29/2022 Order, Prepare Cover letter to Court	2.7 hours
7/5/2022	Prepare Cover letter to Court and file Return of Service in Family Court. TC with client, File motion for	

	Reconsideration	1.4 hours
7/6/2022	TC with client	.1 hours
7/13/2022	Review Amanda Kaelblein' Motion to Dismiss and Move Case to Massachusetts, TC with client	.2 hours
7/18/2022	Prepare and file Objection to Motion to Dismiss, cover letter to Court	1.8 hours
7/25/2022	Review Order on Motion to Dismiss, TC with client	.1 hours
7/30/2022	Review Order on Motion for Reconsideration, review Amanda Kaelblein' Motion to Establish Paternity, prepare And file Objection to Motion to Establish Paternity, Review correspondence from Attorney Kristen Weber, emails to Attorney Kristen Weber	1.7 hours
8/1/2022	Prepare Motion for Temporary Orders, cover letter to Court	2.1 hours
8/2/2022	File Motion for Temporary Orders	.1 hours
8/12/2022	Review correspondence from Attorney Weber, TC with Client	.2 hours
8/23/2022	Review Court Order on Motion for Temporary Orders, TC With Client	.2 hours
8/30/2022	Review correspondence from Attorney Weber, TC with Client	.3 hours
9/12/2022	Review correspondence from Attorney Weber dated 9/2/2022 and 9/12/2022, TC with Client	.3 hours
9/25/2022	Prepare Decree on Parenting Petition, Parenting Plan, Prepare for hearing on Motion to Establish Paternity	2.1 hours
9/26/2022	Prepare for and Attend hearing on Motion to Establish Paternity	2.4 hours
10/7/2022	Review Order on Motion to Establish Paternity	.2 hours
TOTAL HOURS @ \$300.00/ HOUR		24.5 HOURS
BALANCE		\$7,350.00
COSTS:		\$ 0.00
INVOICE TOTAL:		\$7,350.00
CREDIT: \$4,000.00 INITIAL PAYMENT		- \$6,000.00

Balance:	\$1,350.00
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I am waiving the balance of my fee as a courtesy to you.

Very truly yours,

Michael T. Ryan

MTR/stp